

MISSOURI DEPARTMENT OF NATURAL RESOURCES P.O. Box 1368 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

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Site: & (7701)
ID#: M00007452705
Break: 11.6
Other: 417701

July 26, 1982

Mr. Ronald Enos, President Litton Systems, Inc. Advanced Circuitry Division P.O. Box 2847 Springfield, MO 65803

Dear Mr. Enos:

The closure plan for Pond A submitted to Mr. Fred Lafser, Director of the Department of Natural Resources, by Mr. David Edwards, Facilities Manager for Litton Advanced Circuitry Division, is still inadequate for approval by this office. The following should be included in a revised closure plan submitted to this office no later than August 6, 1982:

- 1. Details of how the water remaining in Pond A will be removed and where this water will be taken for treatment.
- At least the metals copper, Cu, and nickel, Ni, should be analyzed along with lead, Pb, and chromium, Cr, in the residual soils.
- 3. The extraction procedure must be performed on each soil sample, which will require at least a 24 hour extraction period prior to Atomic Absorption analysis.
- 4. The maximum allowable extract concentration from the extraction of the residual soils should be:

Lead less than 0.5 mg/l
Total Chromium or Chromium VI less than 0.5 mg/l
Nickel less than 2.0 mg/l
Copper less than 2.0 mg/l

or sampling at various depths may be performed to insure that significant decreases with depth are not occurring, so long as the uppermost residual soils are not over five times the concentrations listed above.

EPA-ARHM/HAZM

Mr. Enos Page 2 July 26, 1982

- 5. A contingency plan should be developed to detail what actions should be taken in the event that a sinkhole develops within the confines of Pond A due to the weight and movement of the heavy equipment. This should detail how the sinkhole will be repaired.
- 6. A closure cost estimate as required by 40 CFR 265.142.

Any treatment of the sludge such as solidification will require the submittance of a revised Part A permit application to EPA and this office along with prior approval before such treatment can occur [40 CFR 122.23 (C)(3)].

Mr. Paul Meiburger will accompany a representative of the Laboratory Services Program of the Department of Natural Resources to obtain some samples of the sludge in Pond A as well as a background soil sample. It is our intent to split at least some of these samples with Litton Advanced Circuitry Division and to compare results once analysis is completed. If you have any questions concerning this letter or the closure plan, Mr. Meiburger should be able to help you.

Sincerely,

David E. Bedan, Ph.D.

Director

Waste Management Program

DEB:PM:d1

cc: Mr. David Edwards, Litton Advanced Circuitry Division

Mr. Robert J. Schreiber, Jr., Director, Div. of Environmental Quality

Mr. Edward Downey, Attorney General's Office Mr. Paul Meiburger, Waste Management Program

Ms. Treva Hearne, Counsel, Div. of Environmental Quality
Mr. Robert Morby, U.S. Environmental Protection Agency